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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
Austin Division

SUTHERLAND GLOBAL SERVICES INC. and
SUTHERLAND HEALTHCARE SOLUTIONS, INC.,

CASE NO: 1:7-cv-00647 SS

Plaintiffs,
v.

DEFENDANT 1 MOSAIC HEALTH INC.'S
ORIGINAL ANSWER

OLIVEDALE, INC. d/b/a MOSAIC HEALTH d/b/a
UNISON HEALTH and 1 MOSAIC HEALTH INC.,

Defendants.

JURY TRIAL DEMANDED

Defendant, 1 Mosaic Health Inc. ("1 Mosaic") files its Original Answer to the Complaint of Plaintiffs, Sutherland Global Services, Inc. and Sutherland Healthcare Solutions, Inc., and alleges:

I. PARTIES, JURISDICTION AND VENUE

1. 1 Mosaic admits the allegations of the parties, jurisdiction and venue of this suit contained in paragraphs 1-6 of the Complaint.

II. ADMISSION AND DENIALS

(Fed.R.Civ.P. 8)

2. On information and belief, 1 Mosaic admits the allegations contained in paragraph 7 of the Complaint.

3. 1 Mosaic denies the allegations contained in paragraphs 8-23 of the Complaint to the extent that they apply to Defendant, 1 Mosaic.

4. 1 Mosaic denies the allegations contained in paragraphs 24-31 of the Complaint to the extent that they apply to Defendant, 1 Mosaic.

III. SPECIAL MATTERS

(Fed.R.Civ.P. 9)

5. 1 Mosaic denies that it can be sued in a capacity as a representative of Defendant Olivedale, Inc. because 1 Mosaic is a separate corporate entity which has never engaged with Plaintiffs as a representative of Defendant Olivedale, Inc.

6. 1 Mosaic denies any agency of Defendant Olivedale, Inc. in the Master Services Agreement that is the subject of Plaintiffs' First Cause of Action against Defendant Olivedale, Inc.

WHEREFORE PREMISES CONSIDERED, Defendant 1 Mosaic Inc. prays the sufficiency of its Original Answer, that Plaintiffs take nothing by their Complaint and Defendant 1 Mosaic Inc. go hence without day and for such other and further relief to which Defendant is entitled at law and in equity.

Respectfully submitted,

/s/ Dale Ossip Johnson

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DEMAND FOR JURY

Pursuant to Fed.R.Civ.P. 38 Defendant demands trial by jury.

CERTIFICATE OF SERVICE

I hereby certify that on 12 September 2017, I presented the foregoing Defendant 1 Mosaic Health, Inc.'s Original Answer to the Clerk of the Court for filing and uploading to the CM/ECF system that will send notification of such filing to the following:

Plaintiffs

Sutherland Global Services, Inc.
Sutherland Healthcare Solutions, Inc.

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